

## Cotton Australia Submission

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To: independent panel first flush mailbox <independentpanel.firstflush@dpie.nsw.gov.au>

Please accept this brief submission from Cotton Australia on the Independent Panel Assessment of the Management of the 2020 Northern Basin First Flush Event.

Cotton Australia is the peak body representing Australia's 1400 cotton growers, and is an active member of the New South Wales Irrigators Council. Cotton Australia also has a very close working relationship with many of the regional catchment based irrigator representative groups such as Barwon-Darling Water, Border Rivers Food and Fibre, Gwydir Valley Irrigators Association, Namoi Water and Macquarie River Food and Fibre.

Cotton Australia shares the concerns of these organisations and endorses their submissions.

Cotton Australia generally agrees with the Panel that the event was run in an inconsistent manner, and communication with stakeholders was poor.

It was extremely frustrating that flow targets changed on a regular basis, often without any logic.

Cotton Australia does not agree that there was inadequate information with regards coming from Queensland, but respectively suggest that key Departmental and Water NSW personnel had simply not taken the time to read and understand the Queensland accredited water resource plans, and associated operating rules. If they had done so, they would have been able to estimate flows across the border in a timely and accurate manner.

Cotton Australia is extremely disappointed that at the time of the draft report being published there were still no accurate details on total flow and total take. Cotton Australia believes these are now in the process of being finalised and will show that total take by irrigators will be in the order of 25 to 30% of total flows, far, far less than many estimates.

Cotton Australia was very disappointed that this report, prepared by acknowledged experts implied that some 220GL had been taken as Floodplain Harvesting, by stating that that was the estimated volume change in Floodplain Harvesting storages. These storages are multi-use, and indeed floodplain harvesting storage is a lesser use,. Unfortunately, this figure was seized upon by some elements of the community and media. The reality is that Floodplain Harvesting take is estimated to be in the order of 30GL.

Cotton Australia is also surprised by claims that this is the first time the NSW Government has tried to manage such an event. For better or worse there have been numerous S324 embargos over the past two decades. The only substantial difference this time was that access to Floodplain Harvesting was also embargoed for most of the event.

The truth of the matter is that it may have been the first time the particular staff had attempted to manage such and event, but that is simply a indication of the very high levels of staff turn-over in the NSW Department.

Cotton Australia fundamentally accepts that at the initial stage of this event an embargo was justified, however, as additional flows became apparent, and target were changed, there was no justification for maintaining the embargo an access.

As an industry we estimate that at least 100,000 megalitres of otherwise legitimate access was denied. This easily equates to minimum of \$50,000,000 (Farmgate) of economic activity across the northern tributary valleys of NSW.

Cotton Australia recommends before developing any additional rules, the panel thoroughly examine the existing water sharing plans, and become fully aware of channel restraint limitations and other matters.

Despite commentary to the contrary all water sharing/resource plans have rules that ensure first flushes and connectivity downstream. If changes must be made, that should be limited to dealing with the impact of historically extended dry no-flow periods.

The Panel should also make it crystal clear that the northern basin systems are ephemeral by nature, and no-flow periods are part of the natural system.

Finally, if additional rules must be applied, they must strike a carefully balance between being fully codified (leaving no room for flexibility, but ensure greater certainty ) and being flexible enough to manage the different circumstances which are naturally part of every event.

To discuss any of these matters further, please contact Michael Murray on [REDACTED].

Your sincerely,



**Michael Murray**  
**GENERAL MANAGER - OPERATIONS**



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